

TULARE LAKE BASIN WATER STORAGE DISTRICT

ESTABLISHED 1926

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July 1, 1998

Mr. Lester Snow
Executive Director
CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, California 95814

Re: Comments on the CALFED Bay-Delta
Programmatic EIR/EIS

Dear Mr. Snow:

The Tulare Lake Basin Water Storage District has been an active participant in the CALFED Bay-Delta process. We continue to support the process for resolving the long-term Delta environmental and water supply issues. To that end, we further support the development of a preferred Delta facilities alternative by the end of 1998, together with the funding and assurances which are paramount to the success of the CALFED Program.

Our District has also been active in the Bay-Delta Ag/Urban Policy Group which developed a White Paper, Draft Discussion Paper Regarding Bay-Delta System Storage, Conveyance, Operations and Water Transfers, Draft #22, June 17, 1998. We support and endorse the positions stated in the paper.

We also actively participated in the Agricultural Water Caucus in developing a White Paper, The Agricultural Water Caucus Position On a Solution For The Bay-Delta, transmitted by Dan Macon, California Farm Water Coalition, July 1, 1998. Please be advised that our District fully supports and endorses the positions as stated in the White Paper and the issues of Land Conversions and Water Use Efficiency further detailed in Mr. Macon's letter.

Addressing the Water Use Efficiency Component (Water Use Efficiency Component Technical Appendix, February 24, 1998 - Draft), it must be noted that the BDAC Water Efficiency Work Group failed to reach a consensus on a report on agricultural water use efficiency. A revised report by the agricultural interests was disregarded by the CALFED staff. Instead, the staff's report, absence consensus by the Work Group, was forwarded to BDAC and incorporated in the Technical Appendix which contains many of the flaws now addressed in the Agricultural Water Caucus' Position Paper.

• COMPRISING TULARE LAKE BASIN IN KINGS AND TULARE COUNTIES, CALIFORNIA •

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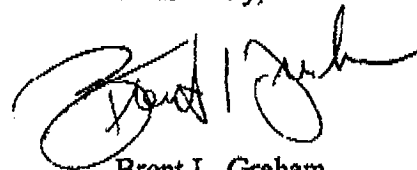
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Expanding upon the White Paper with regard to Water Use Efficiency, "new water" supplies are defined in the Technical Appendix as, "At minimum, new or expanded water supplies will include any supply greater than that which can be delivered under the 1994 Bay-Delta Accord and the Water Quality Control Plan adopted by the State Water Resources Control Board on May 22, 1995." Is it assumed that the water suppliers will be made whole for water relinquished to meet additional Delta flow requirements under the Accord and other regulatory and legislative actions? With reference to water efficiency targets (Additional Irrigation Efficiency Improvements as a Result of the CALFED Program - Page 4-10), CALFED proposes ".....to extend the level of on farm efficiency improvements up to 85 percent." CALFED's analysis fails to look at ag water efficiency in a comprehensive aspect which must include geography, terrain, soils, water quality, crop type, etc. Using 85% efficiency statewide has no scientific basis.

An item that CALFED needs to address in greater depth is the introduction of foreign species into the Bay-Delta waters and their effect on the entire ecosystem. The "conflicting demands" noted in the Executive Overview of the Phase II Interim Report are not the only problems of resource threats to the Bay-Delta.

We appreciate the opportunity to address these issues contained in the Programmatic EIR/EIS and will continue our participation in the process to assure that the solutions to the Bay-Delta issues consider all aspects in "getting better together."

Yours truly,



Brent L. Graham
Manager

BLG:cc

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